

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
BALTIMORE DIVISION**

JASON ALFORD, *et al.*,

Plaintiffs,

v.

THE NFL PLAYER DISABILITY &
SURVIVOR BENEFIT PLAN, *et al.*,

Defendants.

Case No. 1:23-cv-00358-JRR

**DEFENDANTS' JOINT UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE
LIMITATION OF MEMORANDUM IN SUPPORT OF MOTION TO DISMISS**

On behalf of all Defendants and pursuant to Local Rule 105.3, Defendants the NFL Player Disability & Neurocognitive Benefit Plan, the NFL Player Disability & Survivor Benefit Plan, the Bert Bell/Pete Rozelle NFL Player Retirement Plan, and the Disability Board of the NFL Player Disability & Neurocognitive Benefit Plan hereby request leave to exceed the page limitation for their memorandum in support of their joint motion to dismiss. In support thereof, Defendants state as follows:

1. Plaintiffs filed their 86-page Complaint against the 11 Defendants on February 9, 2023.
2. Local Rule 105.3 provides that “[u]nless otherwise ordered by the Court, memoranda in support of a motion or in opposition thereto and trial briefs shall not exceed thirty-five (35) pages, and reply memoranda shall not exceed twenty (20) pages, exclusive of (a) affidavits and exhibits, (b) tables of contents and citations, and (c) addenda containing statutes, rules, regulations, and similar material.”

3. The Federal Rules and Local Rule 105.3 permit each Defendant to move separately to dismiss Plaintiffs' Complaint in a separate brief not to exceed 35 pages, which would potentially amount to 385 pages of briefing.

4. Defendants, however, believe it would serve the interests of efficiency to file a joint motion to dismiss Plaintiffs' Complaint and will use their best efforts to file a consolidated memorandum in support of their joint motion to dismiss that shall not exceed 50 pages.

5. Defendants, therefore, jointly request the Court's leave to exceed the 35-page limitation on length set forth in Local Rule 105.3 and permit them to file a memorandum in support of their joint motion to dismiss that shall not exceed 50 pages.

6. On April 10, 2023, counsel for Plaintiffs informed counsel for Defendants the NFL Player Disability & Neurocognitive Benefit Plan, the NFL Player Disability & Survivor Benefit Plan, the Bert Bell/Pete Rozelle NFL Player Retirement Plan, and the Disability Board of the NFL Player Disability & Neurocognitive Benefit Plan that Plaintiffs do not oppose this relief.

7. The relief sought will not prejudice any party or cause undue waste or delay. Rather, Defendants seek this relief in good faith and in order to respond to Plaintiffs' complaint as efficiently and succinctly as possible.

WHEREFORE, for the foregoing reasons, Defendants respectfully request leave to exceed the page limit set forth in Local Rule 105.3 and to file a 50-page consolidated memorandum in support of their joint motion to dismiss Plaintiff.

Date: April 12, 2023

Respectfully submitted,

s/ Gregory F. Jacob

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Neurocognitive Benefit Plan*

On behalf of all Defendants